

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA)	CASE NO. 3:11-CR-247-3-BR
)	
Plaintiff,)	
vs.)	
)	STIPULATED PROTECTIVE
)	ORDER
MARK A. NEUMAN,)	
TIMOTHY D. LARKIN,)	
LANE D. LYONS.)	
)	
Defendants.)	

WHEREAS, defendants Mark Neuman, Timothy Larkin and Lane Lyons requested and obtained Court authority to issue subpoenas to Trustee Kevin Padrick and Obsidian Financial Group (collectively, the "Trustee") as provided by Federal Rule of Criminal Procedure 17(c);

WHEREAS, defendants have subpoenaed certain documents from the Trustee, including documents that have previously been deemed confidential;

WHEREAS, the Trustee will produce the subpoenaed materials subject to a protective order;

NOW THEREFORE, IT IS HEREBY ORDERED:

1. With respect to all information provided by the Trustee to defendants and designated by the Trustee as confidential, the nature, subject matter, and contents of said information shall be maintained in confidence by counsel for defendants and the government and not further communicated or published to any individual or entity not directly engaged in the

prosecution or defense of defendants in the instant case. Counsel for defendants may give this information to defendants so that they can assist counsel in their defense.

2. Confidential information shall be used solely for the purposes of preparing for and presenting evidence in this criminal case and on appeal, if any. Disclosure may be made to any person if deemed reasonably necessary for the conduct of this criminal matter. Likewise, such information may be published to third parties directly engaged to aid counsel for the government in its prosecution or to aid counsel for the defendants in the defense. To the extent confidential information is communicated directly to the Court, such information shall be filed under seal.

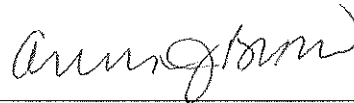
3. With respect to any confidential information filed with the Court in accordance with paragraph (2) above, said information shall remain sealed pending further written order of the Court. In the event a motion to unseal said information is made by an individual or entity not a party to this matter, notice of such a motion/request shall be communicated to the parties hereto and no action shall be taken on any such motion/request for a period of no less than 10 days so as to allow the parties and the Trustee to file any objection or opposition to the unsealing of such information.

4. Counsel for the government and for defendants shall not reproduce confidential information provided by the Trustee, except that copies may be made for use by those necessary to assist counsel for the government or the defense. Defense counsel may give copies of this documentation to defendants so that they may assist counsel in their defense.

5. Any persons employed by counsel for the government or by counsel for the defense who are provided with copies of confidential information under this Stipulated Protective Order shall not copy, display or distribute any of this information to other persons.

6. Counsel for the government and defendants shall maintain custody and control over the confidential information and when this case is concluded, counsel shall store said documentation in a sealed manner together with a copy of this Stipulated Protective Order.

DATED this 26th day of September 2012.



THE HONORABLE ANNA J. BROWN
UNITED STATES DISTRICT JUDGE

Presented by:

/s/ Caroline Harris Crowne

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Obsidian Financial Group

/s/ Carrie Menikoff

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